



**Gideon Orion Oliver**

—ATTORNEY AT LAW—

He/him/his

277 Broadway, Suite 1501  
New York, NY 10007

1825 Foster Avenue, Suite 1K  
Brooklyn, NY 11230

**Gideon@GideonLaw.com\***

**GideonLaw.com**

**Office:** (718) 783-3682

**Signal:** (646) 263-3495

**Fax:** (646) 349-2914\*

*\*Not for service*

September 28, 2023

**BY ECF**

Hon. Eric R. Komitee  
Eastern District of New York  
United States Courthouse  
Room 6G North  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Rayne Valentine v. City of New York. – 21-cv-4867 (EK) (VMS)

Your Honor:

I am co-counsel for Plaintiff Rayne Valentine in the above-captioned matter, in which Plaintiff has accepted an offer of judgment pursuant to Fed.R.Civ.P. 68, and the only outstanding issue is the amount of attorney's fees, costs, and expenses to which Plaintiff is entitled. The Court granted the parties' previous application for an extension of time within which Plaintiff must move for attorney's fees, costs, and expenses, if necessary, setting October 2, 2023 as the deadline. (*See* August 1, 2023 Order).

The parties now jointly request that the Court extend that deadline by 45 days, so that the parties can continue to attempt to resolve the issue of attorney's fees, costs, and expenses without Court intervention.

The parties and counsel thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

Gideon Orion Oliver